

Remarks:

Claims 1-17 and 19-21 are now pending in this application. Applicant has amended claims 1, 3, and 17 and cancelled claim 18 to clarify the present invention. Applicant respectfully requests favorable reconsideration of this application.

Applicant has overcome the objection to the specification by deleting reference to the claims. Applicant respectfully requests withdrawal of the objection to the specification.

The Examiner rejected claims 1-7 and 15-21 under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent 5,040,607 to Cordeiro et al. in view of WO 02/16734 to Alpha Thames Ltd. The Examiner rejected claim 8 under 35 U.S.C. § 103(a) as being unpatentable over Cordiero et al. in view of WO 02/16734 and further in view of U.S. patent 3,536,135 to Dozier. The Examiner rejected claims 9-14 under 35 U.S.C. § 103(a) as being unpatentable over Cordiero et al. in view of WO 02/16734 and further in view of U.S. patent 6,640,901 to Appleford et al.

Cordeiro et al. does not suggest the present invention as recited in amended independent claim 1 since, among other things, Cordeiro et al does not suggest a device for separating fluid. Along these lines, Cordeiro et al. does not include any suggestion of a separator. In fact, no where in the disclosure of Cordeiro et al. does the term "separator" appear. Therefore, Cordeiro et al. does not suggest a device for separating fluid. Cordeiro also does not suggest an insert module that includes a processing appliance of the subsea system and adapted to be removably mounted to the autonomous module. As acknowledged by the Examiner, Cordeiro et al. also does not suggest many other elements of the invention.

Combining the structure suggested by Cordeiro et al. with the structure suggested by Alpha Thames does not suggest the present invention as recited in amended independent claim 1 since, among other things, Alpha Thames does not overcome the above-described deficiencies of Cordeiro et al. For example, Alpha Thames does not suggest an insert module that includes a processing appliance of the subsea system and adapted to be removably mounted to the autonomous module. Additionally, Alpha Thames does not suggest anything that can be considered to give a person skilled in the art any incentive to modify the system disclosed therein so as to arrange a processing appliance of the system in an insert module to be removably mounted to an autonomous module that includes a separator chamber.

Combining the structures suggested by Cordeiro et al. and Alpha Thames with the structures suggested by Dozier or Appleford does not suggest the present invention as recited in amended independent claim 1 since, among other things, neither Dozier nor Appleford overcomes the above-described deficiencies of Cordeiro et al. and/or Alpha Thames. For example, neither Dozier nor Appleford suggests an insert module that includes a processing appliance of the subsea system and adapted to be removably mounted to the autonomous module. Additionally, Dozier suggests a dry chamber with a one atmosphere pressure maintained within the chamber. Dry systems are quite different from wet, remotely operated systems. It would not be obvious to one of ordinary skill in the art to combine elements from wet and dry systems nor would there be any motivation to do so. In view of the above, the combination of Cordeiro et al. and Alpha Thames with Dozier or Appleford does not suggest the present invention as recited in claim 1.

In view of the above, none of the references relied upon in the office action suggests the present invention as recited in claims 1 or claims 2-17 or 19-21, which depend therefrom.

In view of the above, the references relied upon in the office action, whether considered alone or in combination, do not suggest patentable features of the present invention. Therefore, the references relied upon in the office action, whether considered alone or in combination, do not make the present invention obvious. Accordingly, Applicant respectfully requests withdrawal of the rejection based upon the cited references.

In conclusion, Applicant respectfully requests favorable reconsideration of this case and early issuance of the Notice of Allowance.

If an interview would advance the prosecution of this application, Applicant respectfully urges the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit overpayment associated with this communication to Deposit Account 22-0261.

Respectfully submitted,

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